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February 11, 2021

Via ECF

The Honorable District Judge Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **Tacuri, et al. v. Saggio Restaurant Inc., et al.**
20-CV-5219 (RA)(BCM)

Dear Judge Abrams:

Our office represents the Plaintiffs in the above-referenced matter and we submit this letter motion jointly with counsel for Defendants pursuant to the Court's January 14, 2021 Order.

In the January 13, 2021 correspondence to the Court, the parties advised that they were continuing negotiations and believed that they were close to settlement. The parties can now report that they have reached a settlement-in-principle. The parties are currently finalizing the settlement agreement for their clients' review and signatures. In light of the settlement, the parties request a one-week extension to submit their motion for settlement approval and the fully executed settlement agreement to the Court pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015). If this request is granted, the parties can file on or before February 19, 2021.

We thank Your Honor for her consideration on this matter and remain available to provide any additional information.

Respectfully submitted,

/s/
Roman Avshalumov, Esq.

Application granted. The parties shall file their motion for settlement approval no later than February 19, 2021.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams
February 12, 2021